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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit  
 corporation, LAURA LEIGH, individually, and  
 WILD HORSE EDUCATION, a nonprofit  
 corporation,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF THE  
 INTERIOR, BUREAU OF LAND  
 MANAGEMENT, and JON RABY, Nevada  
 State Director of the Bureau of Land  
 Management,

*Federal Defendants.*

Case No. 2:22-cv-01200-CDS-BNW

**JOINT STATUS REPORT**

Per the parties' joint Status report filed on March 20, 2025, ECF No. 94, and the Court's Minute Order entered later that day, ECF No. 95, Federal Defendants and Plaintiffs submit this joint status report on the status of the parties' efforts to obtain the necessary approvals for their settlement agreement in principle to resolve Plaintiffs' First Amendment claim (Sixth Cause of Action) that the Court referred to mediation in its Order on summary judgment, ECF No. 79 at

39, and Plaintiffs' claim for attorneys' fees and costs.<sup>1</sup>

As previously reported, the parties have reached an agreement on draft settlement agreement language that they have proposed as final settlement agreement language in their respective approval processes. Plaintiffs have now obtained the necessary approvals to enter the parties' proposed settlement agreement. Federal Defendants have initiated their own review and approval process, under which appropriate officials at BLM, and subsequently DOJ, must review and approve the agreement. Federal Defendants' review process is still pending, and more time is needed for the appropriate officials to complete their review.

In light of the estimated time needed, the parties plan to file another joint status report by **June 20, 2025**, if they have not filed a settlement agreement by that date.

Dated: May 20, 2025

Respectfully Submitted,

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<sup>1</sup> Please note that Federal Defendants do not currently have authorization to enter a settlement agreement and any such agreement is subject to the review and approval of the appropriate officials at the Bureau of Land Management ("BLM") and the United States Department of Justice ("DOJ").

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 20, 2025, I filed the foregoing Joint Status Report electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Michelle M. Spatz  
Michelle M. Spatz  
U.S. Department of Justice